

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

AGTEXAS, PCA,

Plaintiff,

v.

ROBBIE JAMES BULLOCK and
CARRIE JEAN BULLOCK,

Defendants.

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CIVIL ACTION NO. 2:15-CV-00288-J


PLAINTIFF'S SECOND SET OF INTERROGATORIES IN AID OF JUDGMENT

TO: Robbie James Bullock, P.O. Box 64, Campo, Colorado 81029.

Pursuant to the Federal Rules of Civil Procedure, you are to answer the attached interrogatories separately, fully, in writing, and under oath. The answers must be signed by the person making them. You must deliver your sworn answers to the undersigned attorney within thirty (30) days after the date of service of these interrogatories.

DATED: June 29, 2018

Respectfully submitted,

/s/ Roger S. Cox 

ROGER S. COX, Texas State Bar No. 04956200

UNDERWOOD

P. O. Box 9158

Amarillo, Texas 79105-9158

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Counsel for AgTexas PCA

CERTIFICATE OF SERVICE


A copy of the foregoing was served by First Class Mail and by electronic mail to the following:

Kenneth Netardus, Esq.
knetardus@sjblawfirm.com

Kenneth Netardus, Esq.
P.O. Box 9660
Amarillo, TX 79102

Robbie James Bullock
P.O. Box 64
Campo, CO 81029

Date of service: June 29, 2018

/s/ Roger S. Cox 

DEFINITIONS

A. "Plaintiff" refers to AgTexas, PCA, Plaintiff and judgment creditor in the above-entitled and numbered civil action.

B. "You," and "your" refers to Robbie James Bullock, and all representatives acting or purporting to act on behalf of you with respect to any matter inquired about in these Interrogatories.

C. "Identify," when referring:

1. to a person, means to state his or her full name and present or last known business or residential telephone number, and present or last known business or residential address;

2. to a public or private corporation, partnership, association or other organization, or to a governmental agency, means to state its full name and present or last known pertinent business address and telephone number;

3. to a document means to give a reasonably detailed description thereof, including, if applicable, when, where and how it was made, to identify who made it; and to identify who has present or last known possession, custody or control thereof;

4. to any other tangible thing, means to give a reasonably detailed description thereof, including, if applicable, when, where and how it was made; to identify who made it; and to identify who has present or last known possession, custody or control thereof.

INTERROGATORIES IN AID OF JUDGMENT

1. Please state your current residential address (street address, city, county, state) and telephone number (including area code), any other residential addresses and phone numbers at which you resided for a period of at least one month during the last five years, and the length of time you resided at each location.

ANSWER:

2. Please state your full legal name and any aliases, assumed names, fictitious names, or trade names you have used in the last five years.

ANSWER:

3. If you are now married, please state your spouse's full name and complete present address.

ANSWER:

4. Please state your present employment, including the full name, complete address, and telephone number of your employer, the wages or salary and how often you are paid (for example: daily, weekly, monthly), or if you work for commissions, the average monthly amount of your commissions, the day of the week on which you are paid, or the date or dates on which you are paid every month, or the other regular day or dates on which you are paid, and whether any compensation is presently owed you and, if it is, from what source and what amount is owed.

ANSWER:

5. Please give the full legal description of the real property in which you claim a homestead and describe and state the location and value of each item of personal property that you claim to be exempt from execution.

ANSWER:

6. Intentionally omitted.

7. If you receive income or benefits from any source other than your employment or family contributions listed above, for each source please state the full name and complete address of the source, the amount of the income or benefits paid or received, precisely when each payment is received throughout the year, and the full name, complete address, and telephone number of each person, financial institution, or other entity at which you deposit the payments.

ANSWER:

8. If you, within the last three years, received any real estate or personal property by inheritance, or if you expect to receive any inheritance within the next three years, for each property or inheritance received or expected, please describe, to the greatest extent possible, a complete description of the property, the present estimated market value of the property, the complete present location of the property, the full name of the estate or person from whom the property was or will be inherited, the full name and complete address of the executor or administrator of the estate, the name, number, and location of the court administering the estate, whether there has been a final distribution of the estate and, if so, when it was made.

ANSWER:

9. If you have any form of ownership interest in any real estate (including but not limited to oil and gas or other mineral interests), please provide, for each such property interest, the legal and common descriptions and the location of the property, the size of the property, a description of every improvement on the property, the full name and complete address of every other person or entity having any kind of interest in the property (including those persons claiming a lien or liens), and the estimated present value of your equity in the property.

ANSWER:

10. If any of the property interests described in the previous interrogatory are encumbered (in other words, subject to a lien, deed of trust, security interest, mortgage), also please state the nature of the encumbrance, the name and address of the holder of the encumbrance, when and how the property was bought or acquired, whether any part of the property is within the corporate limits of a town and, if so, the name of the town, whether any money or property has been placed in escrow, the full name and complete address of the person or entity now having possession of any such escrow amount or property, and the amount of any money or value of the property in escrow.

ANSWER:

11. If any of your real property is rented, leased, or otherwise in another party's possession, for each such piece of property please state:

- a. A description of the property
- b. The full name and complete address of the person or entity having possession of the property.
- c. The basis for the third party's possession (lease, rental, etc.).
- d. The payment or other consideration you received in exchange for the arrangement.

ANSWER:

12. For each and any checking account, savings account, trust fund, pension plan, profit sharing plan, mutual fund, or other account or fund of money in which you or your spouse either owns an interest or has a right of withdrawal or deposit, please describe it fully, including, the full name and relationship to you of each person owning an interest in the account or having access to it, the name (other title) and number of the account, the full name and complete address of the person or entity holding the fund, and the present balance in the account.

ANSWER:

13. Intentionally omitted.

14. If you furnished a financial statement to any person or entity in the last five years, please provide the full name and complete address of each person or entity to whom it was furnished, the date it was furnished, and the contents of the statement, copying it verbatim or (if you will do so without a court order) attaching a copy of the statement to your answers.

ANSWER:

15. If you maintain any business or personal account with any bank, savings and loan association, credit union, or postal savings department, for each account please state the full name and complete address of the institution holding the account, the full name and number under which the account is

maintained, the balance of the account five calendar days before the day you received these interrogatories, and the balance of the account the day you answered these interrogatories.

ANSWER:

16. If you are a beneficiary of any trust, for each trust, please state the full name of the trust, the full name, complete address, and telephone number of the trustee, the full name, complete address, and telephone number of each beneficiary of the trust, a detailed description of the terms of the trust as they relate to you as beneficiary, a detailed description of how the trust is funded, the total amount presently held in trust, the portion of the current balance held in trust for you, the date on which rights in the trust will vest in you, a description of the assets owned by the trust and present estimated market value, the account number and location of each checking, savings, or other depository account of the trust, the date and period when trust disbursements are regularly made, and a description of the contents of every one of the trust's tax returns for the last five years, copying the return verbatim or (if you will do so without a court order) attaching copies of the returns to your answers.

ANSWER:

17. If you or any member of your family now residing with you have an ownership interest in any business, partnership, joint venture, or other noncorporate legal entity, then for each interest, please state the full name, complete address, and telephone number of the business or entity, a detailed description of the type of business or other endeavor in which it is engaged, the full name of the person having the interest and, if applicable, your relationship to that person, a detailed description of the interest, the full name and complete address of each officer, director, or partner in the business, the full name and complete address of each bank in which the business maintains any type of checking or deposit account or from which the business has borrowed money, and the present estimated market value of the interest and its percentage of the total value of the business.

ANSWER:

18. If you now own, claim any interest in, or have title to any personal property (for example, equipment, rolling stock, or similar property) now pledged as security for a debt, for each item please state a complete description of the item, including the year, make, model, serial number, and other permanent identification numbers, the amount of the debt the property was pledged to secure and the current amount of the debt, the full name and complete address of the person or entity to whom the property is pledged, the date the debt is to be paid, the date the debt was incurred, the nature of the interest, and the current location of the property.

ANSWER:

19. For each of the following kinds of property in which you now own, claim any interest, please provide (unless previously so described above) a complete description of the item, including account number, registration number, other permanent identification numbers, and other specified identification, the full name and complete address of the person in whose name the item is held, the present value of the item, the amount of the indebtedness outstanding against the item, and the nature of the interest:

- a. Stocks, bonds, or other securities.
- b. Mortgages or liens on real or personal property.
- c. Promissory notes, drafts, bills of exchange, or other commercial paper.
- d. Judgments, claims or other causes of action.
- e. Savings bonds or other government issued bonds.
- f. Any interests in oil, gas, or mineral leases.
- g. Certificates of deposit, letters of credit, money orders, cashier's checks, travelers checks, bank deposits, or escrow funds.
- h. Keogh Plans, Individual Retirement Accounts, profit sharing plans, deferred compensation plans, pension plans, prepaid funeral plans, retirement benefits, or other retirement plans.
- i. Leases, life estates, remainder interests, or other interest in real property.
- j. Patents, copyrights, trademarks, service marks, franchises, or other such license.

ANSWER:

20. Do you now own, claim any interest in, or have title to any personal property, including but not limited to paintings or other art objects, collections of any kind including coin collections, antiques, sporting goods or equipment, firearms, aircraft, boats, trailers, motorcycles, vehicles, machinery or equipment that has not been described in a previous answer? If so, for each item with a value over \$1,000.00 please provide a complete description of the item, including (as applicable) its year, make, model, motor number, serial number, or other permanent identification numbers, the complete address of its present location, the full name and complete address of the person or entity having possession of the certificate of title (if applicable) or other document evidencing title to the item, and the present estimated market value of the item.

ANSWER:

21. For each of your federal income tax returns for the last five years, state the source and amount of each item of income listed, the total income received for each year, whether or not reported, the date each return was filed and the address of the Internal Revenue Service office where it was filed, the amount and source of each amount of income received but not shown on any of the returns that you are attaching to your answers, and the full name and complete address of each person who worked on or helped prepare each return. Alternatively, you may provide a copy of your last five (5) federal income tax returns with your answers to these interrogatories.

ANSWER:

22. Please set forth your current balance sheet, meaning all of your assets and all of your liabilities.

ANSWER:

23. If you have paid or had paid for you the premiums on any life insurance policies during the last five (5) years, please state the name of the issuing company, the policy number, the face value upon death of the insured, present cash value, and the location of the contract of insurance.

ANSWER:

24. If you have conveyed or disposed of any property either by sale, gift, or otherwise, in the past three years without receiving its full, fair market value, then set forth the name and address of the recipient, a description of each item disposed of, the date and manner of disposition, and any consideration received.

ANSWER:

25. As to any debts or other obligations that you now owe, please state the name and address of each creditor, and the amount now owed, when and how the debt was incurred, any security given, and the amount and date of any payments made within the last ninety days (or within the past one year if the payment was to a relative, partner, corporation of which you are a director or officer).

ANSWER:

26. Do you have any claims for money against other persons by reason of notes, personal loans, claims for damage, or other similar claim? If so, please give a complete description of each claim, the name and address of the person indebted to you, and the amount claimed due.

ANSWER:

27. Do you have any accounts receivable or similar contract rights under which you are owed any money, including any assigned or disposed of in the last three years? If so, please give the name and address of each person owing you and the amount due from each, the extent to which future accounts receivable were covered, and the amounts of consideration received.

ANSWER:

SIGNATURES ON FOLLOWING PAGE.

SIGNED on _____, 2018.

Robbie James Bullock

STATE OF _____ §
 §
COUNTY OF _____ §

BEFORE ME, the undersigned authority on this the ____ day of _____, 2018, personally appeared Robbie James Bullock, being by me duly sworn, on oath stated that each of the foregoing answers to Plaintiff's Interrogatories in Aid of Judgment is true and correct.

Notary Public, State of _____